

**IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

LISA FLOWERS, <i>on behalf of herself</i> <i>and those similarly situated</i>)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:23-cv-01079-RLW
)	
SA HOSPITAL ACQUISITION GROUP, LLC, D/B/A SOUTH CITY HOSPITAL)	
)	
)	
Defendant.)	

**MOTION TO WITHDRAW APPEARANCES ON BEHALF OF DEFENDANT SA
HOSPITAL ACQUISITION GROUP, LLC, D/B/A SOUTH CITY HOSPITAL**

COME NOW Brian W. Hockett, Thomas E. Reddin, and Hannah R. Lustman-Rodriguez of Thompson Coburn LLP (“Defendant’s Counsel”) and respectfully move to withdraw their appearances on behalf of Defendant SA Hospital Acquisition Group, LLC, D/B/A South City Hospital (the “Hospital”). In support of their motion, Defendant’s Counsel state as follows:

1. Defendant’s Counsel was engaged in this matter by virtue of its representation of the Hospital’s court appointed general receiver, MorrisAnderson & Associates, Ltd.
2. Defendant’s Counsel also represented the Hospital’s court appointed general receiver in the underlying receivership litigation in the Twenty-Second Judicial Circuit Court of St. Louis County, Missouri (the “Circuit Court”), stylized *Twain GL SSV, LLC v. SA Hospital Real Estate Holdings, LLC, et al*, Case No. 2322-CC00960.
3. On April 18, Plaintiff Lisa Flowers served written discovery requests on the Hospital. The Hospital’s responses to Plaintiff’s requests are due on May 20, 2024.
4. On April 29, the Circuit Court entered an order terminating the receivership as more fully explained in Paragraphs 1-2, *supra*, effective April 30. *See* Order Granting General Receiver’s

Motion to Terminate Administration and Granting Discharge of the General Receiver, attached hereto as **EXHIBIT A** (the “Order”).

5. In the Order, the Circuit Court directed Defendant’s Counsel to withdraw from the receivership litigation and all related litigation, including the instant case. *See* Ex. A, ¶ F (“Thompson Coburn LLP as counsel for the Receiver is hereby directed to terminate its representation of Receiver...in the civil action, *Flowers v. SA Hospital Acquisition Group, LLC*, Case No. 4:23-cv-01079-RLW (E.D.Mo.) (the “WARN Action”) and any other pending litigation, and Thompson Coburn LLP is hereby authorized and directed to withdraw from its representation in the WARN Action and any other pending litigation.”).

6. In light of the Circuit Court’s order that Defendant’s Counsel terminate its representation of the Hospital,, Defendant’s Counsel respectfully requests that the Court grant this Motion, thereby allowing Defendant’s Counsel to withdraw their appearances. By granting the Motion, this Court avoids inconsistency with the decision of the Circuit Court, which could create confusion for the parties and cause delays.

7. Defendant’s Counsel has notified the Hospital (through one of its managing members) that Defendant’s Counsel is required to terminate its representation of the Hospital and requested that the managing member obtain substitute counsel promptly. The managing member of the Hospital has not responded.

8. In addition, Defendant’s Counsel respectfully requests that the Court grant the Hospital a 60-day extension of time in which to answer Plaintiff’s discovery requests. This extension of time would also allow the Hospital to obtain new counsel in the instant case. Pursuant to the Court’s Order entered on January 25, 2024, over one year remains for the parties in the instant case to complete discovery. *See* **Dkt. 26**. As a result, the parties would have ample time to complete

discovery within the bounds of the existing Case Management Order and no prejudice would result to either party from the extension requested in this Paragraph 8.

WHEREFORE, in light of the suggestions in support raised herein, Defendant's Counsel respectfully requests that the Court grant their Motion to Withdraw their appearances on behalf of the Hospital.

Respectfully submitted,

THOMPSON COBURN LLP

By /s/ Hannah R. Lustman-Rodriguez

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 30th day of April 2024, the foregoing was sent by electronic mail or U.S. Mail to the following:

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